

JACOB LAUFER P.C.
65 BROADWAY
SUITE 1005
NEW YORK, NEW YORK 10006

JACOB LAUFER*

MARK ELLIS†
SHULAMIS PELTZ
ZAHAVA SILVERMAN ‡

TELEPHONE (212) 422-8500

FAX (212) 422-9038

* Also admitted in the District of Columbia

† Also admitted in New Jersey

‡ Also admitted in Florida

January 26, 2015

via ECF

Hon. Kenneth M. Karas
United States District Judge
Southern District of New York
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Dear Judge Karas,

I am very sorry to impose upon the Court, but I am compelled to respectfully request that I be relieved from further representation of defendant Rivky Rubin (a/k/a Rivka Rubin). I do so at this time, before the first principal tranche of discovery material has been provided by the government, and before a grant of this relief might impact the progress of this case. I respectfully request that the Court schedule a status conference in this regard.

On the day that the defendants were arrested, my office was contacted on behalf of members of the Rubin family to assist in their arraignment. At the initial arraignment, I appeared on behalf of defendant Joel Rubin, and two associates from my office appeared on behalf of Rivky Rubin and Samuel Rubin. My office had no prior dealings with these defendants. At their arraignment, I advised Magistrate Judge Davison of the joint representation and advised him that I anticipated that these clients would shortly secure separate counsel.

During the ensuing week members of my office worked diligently assisting these defendants in meeting their bail conditions. We appeared again before Your Honor on November 18, 2014 at a conference during which the government advised that it would be providing substantial discovery during January 2015. The Court scheduled the next conference for March 13, 2015.

Hon. Kenneth M. Karas

January 26, 2015

Page Two

Since then, defendants Joel Rubin and Samuel Rubin have each secured the appearance of separate counsel. The remaining defendant for whom we appeared, Rivky Rubin, has neither agreed to retain us nor secured other counsel. I have repeatedly been assured that she would do so, but it hasn't happened.

As the court is aware, this case involves substantial allegations against the defendants spanning a lengthy period of time. It involves massive documentary discovery and potentially a very long trial. Properly representing Rivky Rubin will require an enormous amount of work, which I cannot accomplish without a working relationship with my client, and I cannot afford to undertake without having been formally retained and compensated.

Very truly yours,

/s/ Jacob Laufer

JACOB LAUFER

cc: All counsel (via ECF)
Mrs. Rivky Rubin (via US mail)